

Exhibit 11

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UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

MOTHER DOE, INDIVIDUALLY AND AS THE
MOTHER AND NATURAL GUARDIAN FOR JANE
DOE, A MINOR,

Plaintiff,

vs.

CASE NO.

3:18-CV-02731-CMC

RICHLAND COUNTY SCHOOL DISTRICT TWO,
SHERIFF OF RICHLAND COUNTY IN HIS
OFFICIAL CAPACITY D/B/A RICHLAND COUNTY
SHERIFF'S DEPARTMENT ("RCSD"), JOHN E.
EWING, AND JAMEL BRADLEY,

Defendants.

DEPOSITION OF: [REDACTED]

DATE: November 19, 2019

TIME: 9:35 a.m.

LOCATION: Law Offices of
Halligan, Mahoney & Williams
1301 Gervais St., Suite 1400
Columbia, SC

TAKEN BY: Counsel for the DEFENDANTS

REPORTED BY: SARAH E. YOUNG

Job No. CS3662485

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1 Q. Okay. And --

2 A. Uh-huh.

3 Q. -- with the exception of [REDACTED] do you
4 know if the rest of them did?

5 A. Yes. I trusted my friends. I still
6 trust my friends, even though we're not friends
7 anymore. They respect me, and I respect them.
8 Like -- since this has, you know, blown up and
9 reached the headlines, like [REDACTED] reached back out
10 to me, and she was just like wow, it was other
11 females and other people, it wasn't just you.

12 Q. I know that you said that Deputy
13 Bradley would kiss you. Is that on the mouth?

14 A. Yes.

15 Q. Okay.

16 A. Uh-huh.

17 Q. Anywhere else that he would kiss you
18 while you were at school?

19 A. I mean our relationship was sexual.

20 Q. Okay.

21 A. So yeah.

22 Q. Other places besides your mouth?

23 A. My body.

24 Q. Okay. And you know, you said that your
25 relationship with him was -- was of a sexual

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1 nature. Did any -- did you all engage in sex while
2 you were at school?

3 A. Yes.

4 Q. Where did that occur?

5 A. His office.

6 Q. How many times did that occur?

7 A. Numerous. Can't keep count.

8 Q. Okay. What times of day would that
9 occur?

10 A. It would depend on the day. I would --
11 as a senior, I had enough credits, and I was
12 released like a class after lunch or so.

13 Q. Uh-huh.

14 A. And so I would get out of school at
15 like 1:45 or 2:00 or something like that. And I
16 would go to his office before I would, you know,
17 leave the campus, or sometimes I would go early in
18 the morning to see him, like on late start.
19 Wednesdays there's late starts in the morning, so I
20 would go see him in his office. And that's where
21 that happened at school.

22 Q. Okay. Did -- while you were at school,
23 did you ever share that with any faculty members
24 or --

25 A. No.

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1 testimony, you were interviewed by a captain?

2 A. Uh-huh.

3 Q. And did that occur at the school?

4 A. Yes.

5 Q. Okay. Was anybody from the school
6 present during that interview?

7 A. I believe April Shell was. I can't
8 remember.

9 Q. Uh-huh.

10 A. Before I went in there, I -- I believe
11 he said we tried to call your parents, and they
12 didn't answer.

13 Q. Uh-huh.

14 A. And my mom, like if I would skip class
15 or something, --

16 Q. Uh-huh.

17 A. -- I was in trouble. Like so if
18 someone called about my behavior or something, she
19 would question me immediately. So I don't believe
20 they even tried to contact my parents about that.
21 And I was 17, and I just went in there and got
22 questioned. And you know, it was awkward and
23 scary, like why am I being questioned?

24 Q. Okay. When -- when you were being
25 questioned, you said Ms. Shell was there, right?